

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-MJ-02303-Elfenbein

IN RE SEALED COMPLAINT
_____ /

MOTION TO SEAL

FILED BY CB D.C.

Feb 14, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

The United States of America, by and through its undersigned Assistant United States Attorney, respectfully requests that the Complaint, Affidavit, Arrest Warrant, Bond Recommendation, this Motion, the resulting Order, and any related documents be SEALED until the arrest of the defendant or further Order of the Court. The United States Attorney's Office and any relevant law enforcement agency may obtain copies of the sealed documents for purposes of arrest, extradition, or any other necessary cause. Should this Complaint become public prior to the arrest of the defendant, the named defendant may flee and the integrity of the ongoing investigation might be compromised. The Assistant United States Attorney is prepared to provide further information *in camera* should the Court so require.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

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